



U.S. Department of Justice

*United States Attorney's Office
Southern District of Texas*

*1000 Louisiana
Suite 2300
Houston, Texas 77002*

*Phone: (713) 567-9000
Fax: (713) 718-3300*

May 28, 2021

Honorable George C. Hanks, Jr.
United States District Court
Southern District of Texas

Re: Status of cause no. 4:19-CR-832; United States v. Gerald M. Goines

Judge Hanks:

The United States and Gerald Goines jointly propose that the Court set a status hearing date for Tuesday, September 7, 2021.

When the parties last appeared before the Court on March 3, 2020, it was prior to the institution of COVID-19 related stay-at-home orders in Texas. Although the COVID-19 pandemic restrictions have begun to lift, for over a year the pandemic affected the ability of each party to review discovery, meet with witnesses and clients, engage in case-related discussions with opposing counsel, and prepare for trial. In addition, discovery is still ongoing. Finally, because of the case's complexities, the parties respectfully request the Court set a status conference under 18 U.S.C. § 3161(h)(7)(B)(i) & (ii) for Tuesday, September 7, 2021, at which time the parties are hopeful they will be in a better position to propose dates for motions deadlines, pretrial conference and trial.

Respectfully submitted,

/s/Arthur R. Jones
Arthur R. Jones
Assistant United States Attorney
Southern District of Texas

/s/Alamdar S. Hamdani
Alamdar S. Hamdani
Assistant United States Attorney
Southern District of Texas

/s/Nicole DeBorde
Nicole DeBorde
Counsel for Gerald Goines